

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Civil Action No. 3:21-cv-1036-N

JURY TRIAL DEMANDED

JOINT MOTION TO MODIFY THE SCHEDULING ORDER

Plaintiff SEVEN Networks, LLC and Defendant Motorola Mobility LLC (together, the parties) submit this joint motion to modify certain dates in the Court's February 26, 2024 Agreed Order Modifying the Scheduling Order (Dkt. No. 243) and respectfully show the following:

1. Under the Court's Modified Scheduling Order, rebuttal expert reports are due on May 1, 2024. The deadline for the parties to file dispositive and *Daubert* motions is currently May 16, 2024.
2. The parties have agreed to extend the deadline to serve rebuttal expert reports from May 1, 2024 to May 3, 2024.
3. The parties have worked diligently to schedule the depositions of the expert witnesses. However, due to scheduling conflicts of the expert witnesses, expert depositions are unable to be completed until May 16, 2024. The parties seek two (2) additional business days to prepare and file motions.
4. Under the proposed schedule, rebuttal reports will be due May 3, 2024, and motions will be due on May 20, 2024. Discovery will still close May 16, 2024.

5. Good cause exists for this request because the requested extensions are necessary to permit orderly and complete discovery.

Dated: April 29, 2024

Respectfully submitted,

/s/ David J. Shaw

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was electronically served on all parties of record through the CM/ECF system and via email on April 29, 2024.

/s/ Kevin Schubert

CERTIFICATE OF CONFERENCE

Counsel for Motorola has conferred with counsel for SEVEN. The parties jointly request the relief sought herein.

/s/ Kevin Schubert